

**EXHIBIT A**

<b>DEFENDANT</b>	<b>MISCONDUCT</b>	<b>BASIS OF LIABILITY</b>
<b>The Abdul Aziz al Ibrahim Foundation</b>	<p>The Abdul Aziz al Ibrahim Foundation (the “Foundation”) has long provided financial support and other forms of material support to groups devoted to radical Muslim terrorism including but not limited to al Qaeda. The Foundation conducted or participated directly and/or indirectly in the conduct of the Enterprise’s affairs and participated in the operation or management of the operation of the Enterprise itself. The Foundation conspired to conduct and/or participate in the operation or management of the enterprise itself.</p> <p>Sheikh Abdul Aziz al Ibrahim is a Saudi citizen and the brother-in-law of King Fahd of Saudi Arabia. In 1990, he created the Foundation whose official stated aim is humanitarian assistance. The Foundation is present in Kenya, Bosnia, Chechnya, South America and Southern Asia.</p> <p>The Foundation has built, among others, mosques in Düsseldorf, Gibraltar, Milan and Moscow. The Sheik Ibrahim Mosque in Caracas, the continent’s second largest mosque, was built with funding from the Foundation, according to Iman Omar Kaddoura.</p> <p>The Foundation’s branch in Nairobi, Kenya was associated with Osama bin Laden’s network, as uncovered by the FBI’s investigation into the attacks against the American embassies on August 7, 1998, as was revealed in the confidential publication, <i>French Africa Online</i>.</p> <p>In August 1998, Kenya became the focal point of the international news following the bombing of the U.S. embassies there and in neighboring Tanzania. The attack on the embassy resulted in the death of some 400 Kenyans, as well as twelve embassy staff members; thousands of Kenyans were wounded, many grievously.</p> <p>Fazul Abdullah Mohammed, an al Qaeda operative implicated in the 1998 US Embassy bombings, was arrested and searched by Kenyan authorities. One of the items seized with him was a notebook containing the business card of the Foundation’s director, Abdul Kader M. Izzi. He was also carrying a business card of Mohamed Munir Chaudhri, the lawyer used by Wadi al Hage and al Qaeda operative Khalid al Fawwaz.</p> <p>In September 1998, the Kenyan government cancelled the</p>	<b>1962(c)</b> <b>1962(d)</b>

	<p>registration of five Islamic relief agencies for allegedly supporting terrorism including the Foundation. The authorities claimed that materials for the bomb were smuggled in as relief aid with the help of Islamic relief agencies.</p> <p>The decision was announced by the Kenyan government's NGO coordinator who declared that:</p> <p style="padding-left: 40px;">Our investigations reveal that the operations of these organizations are inconsistent with the reasons for which they were registered. . . . These organizations are supposed to work for the welfare of Kenyans, but are instead endangering Kenyan's lives . . . . They had been found to be working against the interests of Kenyans in terms of security.</p> <p>After several organizations appealed this decision, Kenya's High Court has blocked the deregistration of four of the five non-governmental organizations but the Foundation's was not blocked.</p> <p>In a study paper dated October 1999, called <i>The New Azerbaijan Hub: How Islamist operations are targeting Russia, Armenia and Nagorno-Karabagh</i>, Yossef Bodansky, Senior Editor of Defense and Foreign Affairs' Strategic Policy refers to the Foundation as one of those which provided help to Osama bin Laden:</p> <p style="padding-left: 40px;">The key Islamist facilities are concealed as charity and educational organizations affiliated with the web used by bin Laden's networks. Moreover, the headquarters of these organizations are stuffed with Arab "teachers" and "managers" from the ranks of such organizations as the International Muslim Brotherhood, the Islamic Salvation Front, several branches of Islamic Jihad, and the National Islamic Front of Sudan. The key organizations are . . . . Al Ibrahim Foundation. Very little is known about this Baku-based charity except that its Arab principals have huge amounts of cash in hard currency. They are involved in acquisition of real estate among other "educational" projects.</p> <p>Other reports suggest that the Foundation was funding the Islamic Movement of Uzbekistan (or "IMU"), an affiliate of al Qaeda, whose leaders met Osama bin Laden in 1999 in Kandahar, Afghanistan. Reports stated that the IMU received \$270,000 dollars from the Foundation.</p>	
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	<p>months later the Taliban allocated \$50,000 dollars to support the families of the IMU members based in Afghanistan. In early August of the same year, Bin Laden's five personal envoys visited the village of Hoit in Tajikistan and delivered \$130,000 dollars to Namangani. At that time, IMU fighters were carrying out incursions into Uzbekistan via southern Kyrgyzstan.</p> <p>Shortly thereafter, a meeting took place in Karachi between the members of Islamic organizations from Pakistan, Kuwait, Jordan, Egypt, Palestine, Kashmir, Uzbekistan, and Chechnya. They agreed to raise two million dollars to support the Holy Jihad against Karimov's regime.</p> <p>In June of 2000, IMU's press-secretary Zubair ibnAbdurahman confirmed the receipt of a few thousand dollars from Bin Laden intended to stir up 'the holy war against Karimov 's pro-Zionist government'. According to the Ferghana Province Directorate of National Security, Juma Namangani annually received around three million dollars from Osama bin Laden.</p> <p>During an investigative television program by the Russian NTV, on November 1, 2002, it was disclosed that in July 2002, more than a hundred young men from various regions of Russia attended a seminar organized by the clerical board of Muslims of the Asian part of Russia at Pervouralsk. The official goal of the event was instruction in religious matters. One of the courses was based upon a study in sharia disciplines, published by the Foundation, which emphasized:</p> <p style="padding-left: 40px;">Armed struggle in the name of Allah, for his word to be above all else. . . Sacrifice your life in witness of Allah's religion.</p> <p>According to a document summarizing the seminar, "the main task of the seminar was to select candidates for further instruction at Saudi universities, and to raise the level of Islamic awareness." After the NTV findings, an investigation was conducted and a criminal procedure is pending in Russia.</p> <p>The event took place at the Middle Urals Kaziat Muslim community, where Abdullah bin Abdul Muhsen al Turki started in 1995 a Joint committee for Islamic Action and Studies with representatives from the Muslim World League, Islamic International Relief Organization, and World Assembly for Islamic Youth, along with the Foundation. Saudi-funded textbooks and other publications reveal the presence of institutionalized hate speech. These products are distributed by Saudi officials including</p>	
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	<p>senior diplomats at the Saudi Embassy — as well as by Saudi-funded organizations, such as the Foundation, WAMY and the Institute for Islamic and Arabic Studies in America (“IIASA”), groups that take full advantage of America’s First Amendment freedoms.</p> <p>The book, <i>Deen al-Haqq</i> (The True Religion), authored in Arabic by Abdul-Rahman Bin Hamad Al-Omer, printed by the Ministry of Islamic Affairs and Endowments, paid for by the Foundation and distributed by IIASA and WAMY in the U.S. contains the following:</p> <p>“Judaism and Christianity are deviant religions” (page 25)</p> <p>“The Saved Sect — Muslims are many in number but few in reality, and the groups that claim to be Muslim are many, approaching 73 sects and numbering more than 1 billion.” (An assertion that only Wahhabis are Muslims and all other true Muslims are unbelievers.— page 47)</p> <p>“(Negations of One’s Islam) [Negation 8] - Befriending the unbelievers, through loving and cooperating with them while knowing that they are unbelievers, makes those who are their friends the same as them.” (page 99)</p> <p>“We say to every Christian and every Jew and all those outside Islam, ‘your children are born into Islam, but you and their mother take them away from Islam with your corrupt rearing.’.” (page 119)</p> <p>“There are groups in the Muslim world that claim to be Islamic but they are outside Islam. They claim Islam while in reality they are not Muslims because their beliefs are the beliefs of unbelievers.” (page 123)</p> <p>In March 2002, searches by Bosnian authorities of two purported Muslim charities in Bosnia-Herzegovina yielded a substantial amount of evidence shedding light on the network al Qaeda established, including links to Sheikh Abdul Aziz al Ibrahim al Ibrahim. Documents containing the home and office phone</p>	
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	<p>numbers of Sheikh Abdul Aziz al Ibrahim and the Foundation were found.</p> <p>The raids produced several documents offered into evidence in Government's Evidentiary Proffer Supporting the Admissibility of Co-conspirator Statements, <i>United States v. Enaam M Aranout</i>, No. 02 CR 892 (N.D. Ill, filed January 6, 2003).</p> <p>The Foundation has thereby knowingly, for a period of many years, provided critical financial and logistical support to al Qaeda, and/or Radical Muslim Terrorism to support their global jihad. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of the aforementioned Foundation's participation in the jihad campaign by al Qaeda, and Radical Muslim Terrorism.</p>	
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